David J. Khawam, Esquire Sentry Office Plaza, Suite 604 216 Haddon Avenue Westmont, NJ 08108 (856) 858-1011 Attorney For E Mortgage Management, LLC

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY (CAMDEN VICINAGE)

Russell and Laura Barrett, Individually & as H/W :

1999 Berger Road : Civil Action No.:

Kintnersville, PA 18390 : 1:10-cv-01256-RMB-JS

Plaintiffs,

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v. : **NOTICE OF MOTION** 

: FOR ADMISSION TO

Chris Morgan, et al. : **PRACTICE** *PRO HAC* 

Defendants. : VICE

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 101 of the United States District Court for the District of New Jersey, David J. Khawam, Esquire hereby requests the entry of an Order admitting Andrew J. Goncharoff, Esq. to practice before this Court in this matter *pro hac vice*, on behalf of Defendant E Mortgage Management LLC.

**PLEASE TAKE FURTHER NOTICE** that the certificate of Andrew J.

Goncharoff in support of the application is submitted with this notice of motion.

**PLEASE TAKE FURTHER NOTICE** that a form of order on this application is submitted with this notice of motion.

Dated: June 22, 2010 /s/ David J. Khawam

David J. Khawam

Counsel for Defendant E Mortgage Management LLC